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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

ROQUE MARTINEZ,	)	Case No. 1:24-CV-01245-JLT-BAM
	)	
Plaintiff,	)	STIPULATION AND <del>PROPOSED</del> ORDER
	)	FOR AN EXTENSION OF TIME
vs.	)	
	)	
COMMISSIONER OF SOCIAL SECURITY,	)	
	)	
Defendant.	)	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment be extended twenty-one (21) days from May 26, 2025, up to and including June 17, 2025. The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

This is the Defendant's second request for an extension. Since the last extension request, Defendant has identified a possibility for settlement of this matter and respectfully requests this extension to allow sufficient time to internally discuss, and if required, negotiate with Plaintiff's counsel. Counsel has been diligent in her work, and in the last four weeks, has completed three responsive briefs and a settlement memorandum in one case. Defendant's counsel also recently

1 contracted COVID-19 which limited her productivity. In addition to this case, counsel has eight  
2 upcoming responsive briefs in the next four weeks, including a Circuit brief.

3  
4 Respectfully submitted,

5 Dated: May 27, 2025 By: /s/ Dolly Trompeter\*  
6 (\*as authorized via e-mail on May 27, 2025)  
7 DOLLY TROMPETER  
8 Attorney for Plaintiff

9 Dated: May 27, 2025  
10 MICHELE BECKWITH  
11 Acting United States Attorney  
12 MATHEW W. PILE  
13 Associate General Counsel  
14 Social Security Administration

15  
16 By: /s/ Lillian J. Lee  
17 LILLIAN J. LEE  
18 Special Assistant U.S. Attorney  
19 Attorneys for Defendant

20  
21  
22 **ORDER**

23 Generally, requests for court-approved extensions brought on (or after) the required filing  
24 date are looked upon with disfavor. L.R. 144(d). Nonetheless, in the interest of judicial and  
25 party economy, and for cause appearing, Defendant shall have an extension, up to and including  
26 June 17, 2025, to respond to Plaintiff's Motion for Summary Judgment.

27 IT IS SO ORDERED.

28 Dated: May 28, 2025

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE